

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

SCANNED

)

)

v.)

Criminal No. 02-30043-MAP

)

(1) ALEKSEI SAFANOV,)

(2) IVAN TELEGUZ,)

(3) ROMAN ZHIRNOV,)

(4) ANDREY BUYNOVSKIY,)

(5) MICHAEL QUICKEL,)

Defendants.)

PARTIES' JOINT MEMORANDUM
PURSUANT TO LOCAL RULE 116.5(A)

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, and counsel for the defendants, hereby file their joint memorandum pursuant to Local Rule 116.5(A) :

1. Relief has been granted from the otherwise applicable timing requirements imposed by L.R. 116.3 so that defense counsel could review both written and recorded discovery. Defense counsel will notify the Court at the status conference today as to whether they need additional time to review the discovery.

2. Neither the defendants nor the government have sought discovery concerning expert witnesses under Fed. R. Crim. P. 16(a)(1)(E). The government and the defendants agree to confer and attempt to agree to provide appropriate expert discovery.

3. Both the government and the defense agree to confer with respect to discovery issues should either side receive additional information, documents, or reports of examinations or tests.

4. The defendants will inform the Court at the status conference today as to whether they wish to file motions and whether it is appropriate to establish a motion schedule under Fed. R. Crim. P. 12(c) at this time.

5. Due to the amount of discovery in this case and the need for the defendants to review the discovery and consider their legal options, the defense and the government agree that all of the time from the date of the return of the second superseding indictment until the date of the next status conference should be excluded under the Speedy Trial Act.

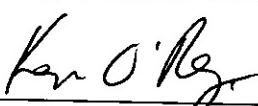
6. It is not clear whether a trial will be necessary. A trial should take one week.

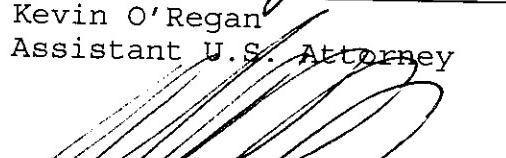
7. A final status conference should not be scheduled. An interim status conference should be scheduled in thirty days.

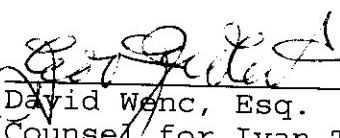
Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

by:

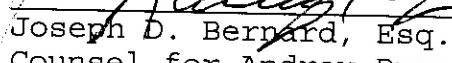

Kevin O'Regan
Assistant U.S. Attorney


Alan Black, Esq.
Counsel for Alexei Safonov


David Wenc, Esq.
Counsel for Ivan Teleguz



Charles J. Sclafani, Jr., Esq.
Counsel for Roman Zhirnov



Joseph D. Bernard, Esq.
Counsel for Andrey Buynovskiy



Richard J. Maggi, Esq.
Counsel for Michael Quickel

Date: April 30, 2004